



Paul R. LePage, Governor

Mary C. Mayhew, Commissioner

# Seasonal Public Water Systems: A Quick Reference Guide to the Revised Total Coliform Rule

Maine CDC Drinking Water Program • 11 SHS Augusta, ME 04330 • 287-2070 • [www.medwp.com](http://www.medwp.com)

## About the RTCR

A revision to the 1989 Total Coliform Rule, the RTCR establishes a maximum contaminant level (MCL) for *E. coli* and uses *E. coli* and total coliforms to initiate a “find and fix” approach to address fecal contamination that could enter into the distribution system. It requires public water systems (PWSs) to perform assessments to identify sanitary defects and subsequently take action to correct them.

**All PWSs must comply with the RTCR requirements starting April 1, 2016.** The RTCR contains provisions specific to seasonal public water systems. This document summarizes the major changes and requirements for Maine’s seasonal public water systems as a result of the RTCR. If you have specific questions about how the RTCR will impact your water system, please contact the Drinking Water Program (DWP).



## WHAT ARE SEASONAL SYSTEMS?

Seasonal systems are defined as non-community public water systems that have an annual operating period of less than 12 months (i.e. only in operation for a portion of the calendar year)

*Examples of seasonal public water systems include, but are not limited to: golf courses, campgrounds, boys and girls camps, ski resorts, and some restaurants, inns, and motels.*

## START-UP PROCEDURES

At the beginning of each operating period, before serving water to the public, every seasonal water system must:

- ▶ Conduct a state-approved start-up procedure; and
- ▶ Certify completion of the state-approved start-up procedure.

**Maine’s state-approved start-up procedures for seasonal groundwater or surface water systems can be found online at [www.medwp.com](http://www.medwp.com)** → click on “Public Water Systems” link → click on “Seasonal Water Systems” link → lastly, click on the applicable “Approved Startup Procedure for Seasonal Water System” document link. To certify completion of the start-up procedure, water systems must complete and sign the start-up procedure template and submit it to their Compliance Officer prior to serving water to the public for the season.

Any start-up procedures for seasonal public water systems that differ from the procedures outlined in Maine’s state-approved start-up plan, including those for seasonal systems using surface water, must be pre-approved by the water system’s DWP Field Inspector.

## SAMPLING SITE PLANS

The RTCR requires that total coliform (TC) samples be collected by PWSs at sites which are representative of water quality throughout the distribution and according to a written sampling site plan subject to State review and approval. Sample site plan requirements under the RTCR include, but are not limited to: establishing sample site locations for routine TC samples, repeat TC samples, raw water samples, and follow-up TC samples. Sample site plans must also identify when samples will be taken during the compliance period.

### Systems on Quarterly TC monitoring

- ▶ Seasonal systems on quarterly [reduced] monitoring for TC must sample during a time considered to be most vulnerable to contamination. This determination must be included on the Sample Site Plan.



**Keep Your Drinking Water Safe:**

7/2015

✓ Protect Your Source

✓ Take Your Samples

✓ Maintain Your Treatment

✓ Inspect Your Pipes & Tanks

## SAMPLING SITE PLANS (CONT.)

<b>All Seasonal Systems</b>	<ul style="list-style-type: none"> <li>▶ Systems do not need to submit revised sample site plans for approval.</li> <li>▶ DWP Field Inspectors will review and work with PWSs to modify sample site plans that meet the guidelines set forth in the RTCR during routine sanitary surveys or on-site visits after April 1, 2016.</li> </ul>
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## ROUTINE SAMPLING

<b>All Seasonal Systems</b>	<ul style="list-style-type: none"> <li>▶ RTCR default monitoring frequency is <b>monthly</b></li> <li>▶ Current sampling frequency for TC will remain in effect until next routine sanitary survey after April 1, 2016, at which point a review of sampling frequency will be done.</li> <li>▶ Sampling frequency may change before next sanitary survey if circumstances arise that warrant an increase in monitoring frequency to monthly such as, but not limited to: <i>E. Coli</i> MCL violation, Total Coliform Treatment Technique violation, or 2 or more Failure to Monitor violations for Total Coliform in 12 month period</li> <li>▶ When sampling frequency is reviewed at a sanitary survey, PWSs must meet the following criteria in order to be approved to reduce to and/or maintain quarterly Total Coliform monitoring: <ul style="list-style-type: none"> <li>• Approved Sample Site Plan with identified optimal time for monitoring</li> <li>• Clean compliance history for Total Coliform over the last 12 months</li> <li>• Free from sanitary defects or have an approved corrective action plan</li> <li>• Need to have had a sanitary survey or Level 2 Assessment within the last 12 months</li> <li>• Protected Source (source(s) at least 300ft away from leachfields, manure piles, agricultural spreading, etc)</li> </ul> </li> </ul>
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## REPEAT SAMPLING FOLLOWING A POSITIVE TOTAL COLIFORM RESULT

<b>All Seasonal Systems</b>	<ul style="list-style-type: none"> <li>▶ Within 24 hours of learning of a TC positive (+) routine sample, at least 3 repeat TC samples must be collected according to repeat sites identified in system's approved RTCR sample site plan</li> <li>▶ If any repeat TC+ sample is also <i>E. coli</i> +, the <i>E. coli</i> + sample result must be reported to DWP by the end of the day that PWS is notified</li> </ul>
<b>Systems on Quarterly TC monitoring</b>	<ul style="list-style-type: none"> <li>▶ Must take minimum of 3 additional routine samples the month following a TC+ routine or repeat sample</li> </ul>

## ASSESSMENTS AND CORRECTIVE ACTIONS

The RTCR requires PWSs that have an indication of coliform contamination (e.g. as a result of TC+ samples, *E. Coli* MCL violations, performance failure) to assess the problem and take corrective action. There are two levels of assessments (Level 1 and Level 2) based on the severity or frequency of the problem.

<b>Triggering an Assessment</b>	<p><b>Level 1 Assessments are triggered by:</b></p> <ul style="list-style-type: none"> <li>◆ 2 or more TC+ routine/repeat samples in the same month <u>OR</u> for systems collecting 40 or more samples each month: greater than 5% of routine/repeat samples positive</li> <li>◆ Failure to take required repeat sample(s) after any single TC+</li> </ul> <p><b>Level 2 Assessments are triggered by:</b></p> <ul style="list-style-type: none"> <li>◆ <i>E. coli</i> MCL violation</li> <li>◆ Second trigger of a Level 1 Assessment within a rolling 12 month period</li> </ul>
<b>Conducting an Assessment</b>	<p><b>Level 1 Assessments can be performed by:</b></p> <ul style="list-style-type: none"> <li>◆ For PWSs not required to have a licensed operator: PWS Owner or responsible party, or DWP personnel or approved entity.</li> <li>◆ For PWSs required to have a licensed operator: a licensed operator at a grade comparable to or higher than the grade of the PWS, or DWP personnel or approved entity.</li> </ul> <p><b>Level 2 Assessments can be performed by:</b></p> <ul style="list-style-type: none"> <li>◆ For systems not required to have a licensed operator: a licensed operator holding both a Class II Treatment <u>and</u> Class I Distribution license or higher, or DWP personnel or approved entity.</li> <li>◆ For PWSs required to have a licensed operator: a licensed operator holding a license with treatment and distribution classes equal to or higher than that of the PWS, at a minimum Class II Treatment <u>and</u> Class I Distribution, or DWP personnel or approved entity.</li> </ul>
<b>Corrective Actions</b>	<p>When sanitary defects are identified during a Level 1 or Level 2 Assessment, they should be corrected as soon as possible to protect public health and must be completed within the following timeframes:</p> <ul style="list-style-type: none"> <li>◆ No later than the time the assessment form is submitted to DWP, which must be within 30 days of triggering the assessment; or</li> <li>◆ Within state-approved timeframe which was proposed in the assessment form.</li> </ul>